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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IRON TRIBE FITNESS, on behalf of itself and
all others similarly situated,
Plaintiff,

v.

META PLATFORMS, INC.,
Defendant

Case No. 3:25-cv-3281

**DECLARATION OF MICHAEL
BLATCHLEY IN SUPPORT OF
PLAINTIFF IRON TRIBE FITNESS'S
OPPOSITION TO DEFENDANT
META PLATFORMS, INC.'S
MOTION TO STAY DISCOVERY**

CLASS ACTION

Courtroom: 6, 17th Floor
Before: The Hon. Charles R. Breyer

1 I, Michael Blatchley, declare and state as follows:

2 1. I am a partner at the law firm Bernstein Litowitz Berger & Grossmann LLP, counsel
3 for Plaintiff in the above-captioned matter admitted *pro hac vice* to this Court. I submit this
4 declaration in support of Plaintiff's Opposition to Defendant's Motion to Stay Discovery. I have
5 personal knowledge of the facts set forth below, and I could and would competently testify to the
6 following if called upon to do so.

7 2. The parties to this action stipulated to a briefing schedule on April 24, 2025 in which
8 they agreed to a briefing schedule for Meta's anticipated motion to dismiss.

9 3. During the week of June 16, 2025, the parties scheduled a Rule 26(f) conference for
10 June 27, 2025. On June 26, 2025, the day before the previously scheduled Rule 26(f) conference,
11 counsel for Meta informed counsel for Plaintiff that Meta would move to stay discovery pending
12 resolution of Meta's motion to dismiss, which had been filed almost two weeks before, on June 16,
13 2025, under the schedule agreed to in April.

14 4. On June 27, 2025, the parties held their Rule 26(f) conference, during which Plaintiff
15 informed Defendant that Plaintiff would oppose any forthcoming motion to stay discovery. During
16 the conference, Meta took the position that it would be premature for the parties to discuss the case
17 schedule and certain other items contemplated by Local Rule 16-9 in detail in light of its forthcoming
18 motion to stay discovery. Meta did not articulate any particular burden it would experience if
19 discovery were to proceed.

20 5. Following the conference, Plaintiff explained that it did not oppose Meta's request to
21 reschedule the previously scheduled Rule 16 conference, but that it would not agree to move any
22 other operative discovery or other deadlines.

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24 [SIGNATURE PAGE FOLLOWS]
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on this 16th day of July in New York, NY

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4 /s/ Michael D. Blatchley

5 MICHAEL D. BLATCHLEY
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